

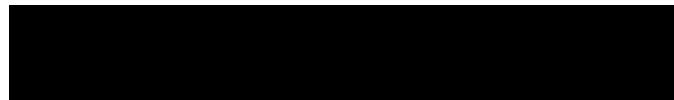
EXHIBIT 7

(REDACTED)

In the Matter Of:

JANE DOE vs

MINDGEEK USA INCORPORATED



July 12, 2023



1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 SOUTHERN DIVISION
4

5 JANE DOE, on behalf of herself and)
6 all others similarly situated,)
7 Plaintiffs,)
8 vs.) Case No.
9 MINDGEEK USA INCORPORATED, MINDGEEK)
10 S.A.R.L., MG FREESITES, LTD (d/b/a)
11 PORNHUB), MG FREESITES II, LTD, MG)
12 CONTENT RT LIMITED and 9219-1568)
13 QUEBEC, INC. (d/b/a MindGeek),)
14 Defendants.)
15

16 C O N F I D E N T I A L

17 - - -
18 Wednesday, July 12, 2023
19 - - -

20 Videotaped deposition of
21 [REDACTED] held at the offices of
22 Dechert, LLP, 1095 Avenue of the Americas, New
23 York, New York 10036, before Elizabeth M.
24 Kondor, Certified Court Reporter and Notary
25 Public of the State of New York, on the above
date, commencing at 9:03 a.m.

26

27

28 Job No. 2023-903605

20

1 Q. -- do you see your e-mail beginning
2 May 29, 2020?

3 A. Yes.

4 Q. On May 29, 2020, you e-mailed [REDACTED]
5 [REDACTED] and wrote: "Hey, [REDACTED] please note that
6 the following rules divided by category
7 represent the requirements by which
8 user-generated content on the Pornhub network is
9 graded and judged by MindGeek content compliance
10 and brand protection. This is based on our
11 extensive experience dating back to almost seven
12 years. While we don't have any of those rules
13 written, we base our review on team experience."

14 Did I read that correctly?

15 A. You did.

16 Q. From 2013 to 2020, you did not have
17 any rules written how to grade and judge
18 user-generated content that might constitute
19 CSAM, correct?

20 MS. MASSEY: Object to form.

21 A. My department didn't, but the tube's
22 department.

23 Do you understand tubes? They did.

24 And we used their version of the
25 rules plus our version. We have our own rules,

21

1 which are rules that are done for paysites, plus
2 the experience of the team to judge and audit
3 content after it goes live on our tubes
4 division.

5 Q. From 2011 to 2013, the tubes division
6 was responsible for the rules to audit the
7 content as potential CSAM, correct?

8 MS. MASSEY: Object to form.

9 A. I don't know.

10 Q. From 2011 to 2013, the tubes
11 department had written rules how to grade and
12 judge user-generated content that might
13 constitute CSAM, correct?

14 MS. MASSEY: Object to form.

15 A. Again, I don't know.

16 Q. You said prior to 2013, the tubes
17 department was responsible for auditing content
18 for tube websites, right?

19 A. I did not say that.

20 Q. Prior to 2013, the tubes
21 department -- let me rephrase that question.

22 Do you mind?

23 A. Sure.

24 Q. Prior to 2013, did the tubes team
25 have responsibility for auditing content on tube

203

1 department.

2 Q. You referred to right now requesting
3 additional IDs for performers in videos,
4 correct?

5 A. Correct.

6 Q. Under what circumstances would you
7 need to request additional IDs for performers in
8 videos?

9 MS. MASSEY: Object to form.

10 A. There's very -- tons of scenarios.

11 Q. What's one?

12 A. We receive a content removal request
13 saying I'm in this video and I did not consent
14 to be in this video. We request IDs. We get a
15 flagged video that says I know this person, and
16 she does not want to be on Pornhub. We
17 investigate. Somebody is reviewing content and
18 they're not able to see the face of the girl, we
19 could request IDs.

20 And the list goes on and on and on.

21 Q. And if someone submits a content
22 removal request now, stating I think the girl
23 depicted in the video is under the age of 18,
24 you might request identification from the
25 additional performer in the video, correct?

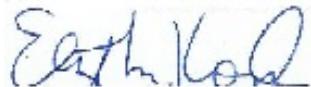
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1 C E R T I F I C A T E

2 I, ELIZABETH M. KONDOR, a Certified
3 Court Reporter, No. 30XI00117200, Certified
4 LiveNote Reporter, No. 060907-14 and Notary
5 Public of the State of New York, do hereby
6 certify that prior to the commencement of the
7 examination, [REDACTED] was duly sworn
8 by me to testify the truth, the whole truth and
9 nothing but the truth.

10 I DO FURTHER CERTIFY that the
11 foregoing is a true and accurate transcript of
12 the testimony as taken stenographically by and
13 before me at the time, place and on the date
14 hereinbefore set forth.

15 I DO FURTHER CERTIFY that I am
16 neither a relative nor employee nor attorney nor
17 counsel of any of the parties to this action,
18 and that I am neither a relative nor employee of
19 such attorney or counsel, and that I am not
20 financially interested in the action.

21 
22

23 Notary Public of the State of New York

24 My Commission expires September 19, 2026.

25 Dated: Thursday, July 20, 2023